

Self-Supply of Balancing Services Business Practice, 1

Portland General Electric comments for BPA Self-Supply of Balancing Services Business Practice, Version 1

Portland General Electric Company (PGE) appreciates the opportunity to comment on Bonneville Power Administration's (BPA) business practice "Self-Supply of Balancing Services, Version 1. PGE values the investment BPA puts into creating innovative operating business practices for integration of variable energy resources. As a Variable Energy Resource Balancing services (VERBs) and Point to Point (PTP) transmission customer, PGE has considerable interest in flexible options for the integration of variable resources on BPA's system. PGE provides the following three recommendations for consideration.

1. PGE recommends BPA adjust the business practice to allow explicit use of a specified Balancing Area Authority to provide incremental or decremental balancing components. In the Self-Supply of Balancing Services, Version 1, section A.2 states the customer must "Identify the generation facilities for which it desires to self-supply Balancing Services;". PGE recommends additional language to allow for self-supply of Balancing Services components from a WECC Balancing Authority Area system boundary. The recommended change to A.2 might read; "Identify the generation facilities or WECC Balancing Area Authority system boundary for which it desires to self-supply Balancing Services;"
2. PGE also recommends Self-Supply Customers be allowed to supply incremental and decremental components individually or in any combination. PGE believes that allowing the option to elect individual components will improve participation in the program. PGE recommends the following revision as a first step in re-shaping the business practice. In the General Requirement section of the business practice, A.4 currently states "Supply all incremental and decremental component for regulation, following, and generation imbalance;". PGE recommends a revision of the language to rely on an executed Self-Supply of Balancing Services Participation Agreement to define components to be supplied by the Self-Supply Customer. A change to the general requirement A.4 might read; "Supply the incremental and decremental components for regulation, following, and generation imbalance as defined in an executed Self-Supply of Balancing Services Participation Agreement;"
3. Finally, under Section J, "Failure to Meet Self-Supply Obligations" 1.C and 2.C, PGE recommends the following changes would make it easier for customers to monitor strike tracking as telephone communications are difficult to document;
 - 1.C "BPA Transmission Services will notify the Self-Supply Customer of the occurrence of a strike and the current 30-day strike count by letter or email."
 - 2. C "BPA Transmission Services will notify the Self Supply Balancing Resource and the Self-Supply Customer of the strike occurrence of a strike and the 30 day strike count by letter or e-mail."

PGE believes that allowing an a-la-cart self-supply approach to incremental and decremental components, allowing Balancing Area Authority system boundary supply and improving strike notification documentation increases flexibility, communications and entices participation in the Self-Supply program.

Merchant Transmission & Resource Integration |
Portland General Electric Merchant |
121 SW Salmon St. 3WTC0306 | Portland, Oregon 97204 |
W: 503-464-7013 | C: 425-698-7742 | F: 503-464-7608 |
E: shawn.davis@pgn.com